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10 NVIDIA CORPORATION, JENSEN  
11 HUANG, and COLETTE KRESS

12  
13  
14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

16 In re NVIDIA CORPORATION  
17 SECURITIES LITIGATION

18 This Document Relates to: All Actions.

19 Case No. 4:18-cv-07669-HSG

20 **UNOPPOSED MOTION, STIPULATION, AND  
21 ORDER TO EXCEED PAGE  
22 LIMITATIONS FOR BRIEFING ON  
23 DEFENDANTS' MOTION TO DISMISS**

24 **CLASS ACTION**

25 Judge: Hon. Haywood S. Gilliam, Jr.  
26 Courtroom: 2

1 Pursuant to Local Rules 7-11 and 7-12, and with consent of Lead Plaintiffs E. Öhman J:or  
2 Fonder AB and Stichting Pensioenfonds PGB (collectively, “Plaintiffs”), Defendants NVIDIA  
3 Corporation, Jensen Huang, Colette Kress, and Jeff Fisher (jointly, “Defendants”) hereby move the  
4 Court for leave to (1) file a motion to dismiss that exceeds Local Rule 7-2(b)’s 25-page limitation by  
5 up to 10 pages; (2) allow Plaintiffs to file an opposition to Defendants’ motion to dismiss that exceeds  
6 Local Rule 7-3(a)’s 25-page limitation by up to 10 pages; and (3) file a reply to Plaintiffs’ opposition  
7 that exceeds Local Rule 7-3(c)’s 15-page limitation by up to 5 pages.

8 In support of their unopposed motion, Defendants state as follows:

9 WHEREAS, on June 21, 2019, Plaintiffs filed their Consolidated Class Action Complaint for  
10 Violations of the Federal Securities Laws (the “Amended Complaint”), which contains 210 separately  
11 numbered paragraphs on 62 pages;

12 WHEREAS, the Amended Complaint alleges that 13 separate statements made by Defendants  
13 over the 18-month Class Period were actionable false under the federal securities laws, and each such  
14 statement was made in a separate public document and/or forum;

15 WHEREAS, on August 2, 2019, Defendants intend to file a motion to dismiss each of  
16 Plaintiffs’ claims on the ground that each of these claims fail to state a claim upon which relief can be  
17 granted (the “Motion”);

18 WHEREAS, Defendants are filing one single motion to dismiss on behalf of all four  
19 Defendants;

20 WHEREAS, although Defendants endeavor to keep their Motion as brief as possible,  
21 Defendants believe that they cannot adequately address each of their arguments in the 25 pages  
22 afforded by Local Rule 7-2(b);

23 WHEREAS, Defendants submit that their Motion is concise, free of repetition, and addresses  
24 only pertinent points and authorities, but that an additional 10 pages is needed to fully address each of  
25 the foregoing arguments and supporting authority;

26 WHEREAS, Plaintiffs intend to file a single opposition to the four Defendants’ motion to  
27 dismiss (the “Opposition”);

28 WHEREAS, although Plaintiffs respectfully submit that their Opposition will be concise, free

1 of repetition, and address only pertinent points and authorities raised in Defendants' Motion, Plaintiffs  
2 anticipate requiring an additional 10 pages beyond the 25 pages afforded by Local Rule 7-3(a) to  
3 adequately oppose Defendants' Motion in light of the heightened page limit that Defendants request  
4 herein;

5 WHEREAS, in consideration of the heightened page limits of the Motion and Opposition,  
6 Defendants' believe their reply to Plaintiffs' Opposition cannot be adequately stated in the 15 pages  
7 afforded by Local Rule 7-3(c);

8 Accordingly, IT IS HEREBY STIPULATED AND AGREED between the parties, by and  
9 through their counsel of record and subject to order of the Court, as follows:

10 (1) Defendants' Motion may exceed the page limitation in Local Rule 7-2(b) by ten (10)  
11 pages.

12 (2) Plaintiffs' Opposition to Defendants' Motion may exceed the page limitation in Local  
13 Rule 7-3(a) by ten (10) pages.

14 (3) Defendants' reply to Plaintiffs' Opposition may exceed the page limitation in Local  
15 Rule 7-3(c) by five (5) pages.

16 Dated: July 18, 2019

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20 */s/ John Dwyer*  
21 John C. Dwyer (136533)

22 Attorneys for Defendants  
23 NVIDIA CORPORATION, JENSEN  
24 HUANG, COLETTE KRESS and JEFF FISHER

1 Dated: July 18, 2019

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ERIC K. GERARD (PRO HAC VICE)

4 */s/ Andrew Zivitz*  
5 Andrew L. Zivitz (Pro Hac Vice)

6 Attorneys for Lead Plaintiff E. Öhman J:or  
7 Fonder AB

8  
9 Dated: July 18, 2019

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10 */s/ Jonathan Uslaner*  
11 Jonathan D. Uslaner (256898)

12  
13 Attorneys for Lead Plaintiff Stichting  
14 Pensioenfonds PGB

15 Pursuant to Civil L. R. 5-1(i)(3), I, John C. Dwyer, hereby attest that the concurrence to the  
16 filing of the foregoing document has been obtained from the signatories.

17  
18 Dated: July 18, 2019

19 */s/ John Dwyer*

20 John C. Dwyer (136533)

21  
22 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

23  
24 Dated: 7/19/2019

25  
26   
27 The Honorable Haywood S. Gilliam, Jr.  
28 United States District Judge